

Exhibit 35

De'JON HALL

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST by and through
MARIELLE SHAVONNE SMITH and CHARIS HUMPHREY
on behalf of its members, SHAKETA REDDEN,
DORETHEA FRANKLIN, TANIQUA SIMMONS, DE'JON HALL,
JOSEPH BONDS, CHARLES PALMER, SHIRLEY SARMIENTO,
EBONY YELDON, and JANE DOE,
individually and on behalf of a class of all
others similarly situated,

Plaintiffs,

-vs-

CITY OF BUFFALO, N.Y., BYRON B. BROWN,
Mayor of the City of Buffalo, in his individual and official
capacities,
BYRON C. LOCKWOOD, Commissioner of the
Buffalo Police Department, in his individual
and official capacities,
DANIEL DERENDA, former Commissioner of the
Buffalo Police Department, in his individual capacity, AARON
YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI,
ROBBIN THOMAS,
UNKNOWN SUPERVISORY PERSONNEL 1-10,
UNKNOWN OFFICERS 1-20, each officers of the
Buffalo Police Department,
in their individual capacities,

Defendants.

Examination Before Trial of
De'JON HALL, Plaintiff, taken pursuant to the Federal Rules
of Civil Procedure, in the law offices of HODGSON RUSS LLP,
The Guaranty Building, 140 Pearl Street, Suite 100, Buffalo,
New York, taken on May 17, 2023, commencing at 3:08 P.M.,
before NICHOLE WINANS, Notary Public.

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For Identification

S LinkedIn Profile

6

T Note

6

1 APPEARANCES:

2 WESTERN NEW YORK LAW CENTER,
3 By KEISHA A. WILLIAMS, ESQ.,
4 Cathedral Park Tower,
5 37 Franklin Street,
6 Suite 210,
7 Buffalo, New York 14202,
8 Appearing for the Plaintiffs.

6 NATIONAL CENTER FOR LAW AND ECONOMIC JUSTICE,
7 By KARINA K. TEFFT, ESQ.,
8 50 Broadway,
9 Suite 1500,
10 New York, New York 10004,
11 Appearing for the Plaintiffs.

9 HODGSON RUSS LLP,
10 By PETER A. SAHASRABUDHE, ESQ.,
11 The Guaranty Building,
12 140 Pearl Street,
13 Suite 100,
14 Buffalo, New York 14202-4040,
15 Appearing for the Defendants.

14
15 (The following stipulations were entered
16 into by all parties.)

17 It is hereby stipulated by and between counsel
18 for the respective parties that the oath of the
19 Referee is waived, that signing, filing and
20 certification of the transcript are waived, and
21 that all objections, except as to the form of the
22 questions, are reserved until the time of trial.
23

1 (Whereupon, a LinkedIn Profile was then
2 received and marked as Defendant's Exhibit S, and
3 a Note was then received and marked as
4 Defendant's Exhibit T, for identification.)
5

6 D e ' J O N H A L L,
7 280 East Broad Street, Rochester, New York 14604,
8 after being duly called and sworn,
9 testified as follows:
10

11 EXAMINATION BY MR. SAHASRABUDHE:
12

13 Q. Good afternoon, Mr. Hall. We met off the record,
14 my name is Peter Sahasrabudhe, and before we were
15 on the record, we mentioned you're a 2016
16 graduate of the SUNY Buffalo School of Law?

17 A. Yes.

18 Q. So you're familiar with what depositions are?

19 A. Somewhat.

20 Q. Okay. Have you ever given a deposition before?

21 A. No.

22 Q. Okay. I'm going to go over some ground rules
23 very briefly. We'll get through them quick, but

1 I'm going to go through them just so the record
2 is clear and so we're on the same page. Okay?

3 A. Um-hum.

4 Q. Okay. So the first thing I want to go over with
5 you, I need a full verbal response to all my
6 questions, just so that the record gets
7 accurately transcribed. So even if it's a one
8 word answer, can you give a full verbal response
9 whether that's a yes or a no?

10 A. Yes.

11 Q. Okay. If you don't understand a question, ask me
12 to rephrase and I will. I can totally rephrase,
13 but if you do answer any question without asking
14 me to rephrase or telling me you don't
15 understand, I'm going to assume that means you
16 understood my question. Is that fair?

17 A. Yes.

18 Q. Okay. From time to time your lawyer may object,
19 but unless you're directed not to answer a
20 question, you have to answer all questions
21 truthfully and accurately. Do you understand
22 that?

23 A. Yes.

1 Q. Okay. And you're under oath, you of course
2 understand what that means?

3 A. Yes. I believe so.

4 Q. Okay. If you need to take a break at any time,
5 you're totally entitled to do that. I don't
6 think we're going to go very long today, but if
7 you need a break, I just ask that if there's a
8 question pending, you answer the question and
9 then we can take a break. Do you understand
10 that?

11 A. Yes.

12 Q. Okay. Anything I should know about that would
13 affect your ability to give truthful and accurate
14 testimony?

15 A. Not to my knowledge.

16 Q. Okay. What, if anything, did you do to prepare
17 for your testimony today? And I'll -- with the
18 caveat, I don't want to know any substantive
19 conversations you had with your attorneys, but if
20 you did meet with them, I would like to know.

21 A. I did meet with them.

22 Q. On how many occasions?

23 A. Once.

1 Q. When was that meeting?

2 A. Don't remember the exact date, it was maybe
3 earlier -- no. It was last week Friday I think.

4 Q. So within the last week?

5 A. Yeah. Within the last week.

6 Q. How long was that meeting?

7 A. Oh, I don't recall the length. It might have
8 been about an hour.

9 Q. Okay. What, if any, documents did you look at
10 during that meeting?

11 A. Documents prepared by my attorneys.

12 Q. Okay. Did you review the amended complaint in
13 this action?

14 A. Yes.

15 Q. Okay. Do you recall any other specific documents
16 you looked at?

17 A. Just the ones prepared by my attorneys.

18 Q. Okay. When you say prepared by your attorneys, I
19 don't want to know of any notes or any outlines
20 that they shared with you. Is that what you're
21 referencing?

22 A. Yes.

23 Q. Okay. Other than notes, outlines prepared by

1 your attorneys, and the amended complaint, can
2 you think of any other specific documents?

3 A. I believe there were screenshots of social media
4 posts.

5 Q. Okay. And we'll talk about at least one of those
6 later on. Anything else that you can think of?

7 A. No.

8 Q. Okay. I want to talk about your background a
9 little bit. So you graduated law school in 2016?

10 A. Yes.

11 Q. Are you currently licensed to practice law?

12 A. No.

13 Q. Okay. Have you ever practiced law?

14 A. No.

15 Q. All right. How are you currently employed?

16 A. Currently I work for the City of Rochester.

17 Q. In what capacity?

18 A. Acting chief of policy and oversight for the
19 Rochester Police Accountability Board.

20 Q. What is the Rochester Police Accountability
21 Board?

22 A. It is an independent civilian oversight agency.
23 I tried to get one here in Buffalo, but we were

1 unsuccessful.

2 Q. Is it publicly funded?

3 A. It is.

4 Q. All right. What role -- I think you told me your
5 position, but what specifically do you do in that
6 position?

7 A. So in my current position, I've had multiple at
8 the agency, my current position is to review and
9 assess Rochester Police Department's policies,
10 practices and procedures, as well as training
11 within the police department.

12 Q. And do you then make recommendations to RPD?

13 A. Absolutely, yes.

14 Q. All right. And how long have you been doing
15 that?

16 A. This role I started in March. Prior to that I
17 was deputy chief of oversight, that began in
18 November, and prior to that I was deputy chief of
19 investigations, which started in May of 2022.

20 Q. So before your current role you were deputy chief
21 of oversight?

22 A. That's correct.

23 Q. Okay. Was the role similar to the role you have

1 now or was it different?

2 A. Similar.

3 Q. Okay. Doing the same things that you do now, but
4 in just a little bit different of a capacity?

5 A. Yes.

6 Q. Okay. And you're not the head of that division
7 or department, if you will?

8 A. I am the head of that division.

9 Q. My apologies. You were not when you were the
10 deputy chief?

11 A. I was not.

12 Q. Okay. And you are now?

13 A. I am.

14 Q. All right. Other than making recommendations to
15 RPD on their policies and procedures, what other
16 role do you play?

17 A. Well, I supervise my team, which includes data
18 analyst, and an accountability inspector. We
19 have two tracks of work, one is oversight
20 investigations, the other is proposals for
21 changes, which is a nickname for policy
22 recommendations.

23 Q. Okay. So in your current role, you also oversee

1 investigations into allegations of misconduct by
2 police officers?

3 A. That would have been my previous role as deputy
4 chief of investigations.

5 Q. Okay. So in your current capacity, you no longer
6 do that?

7 A. No. But we still review, you know, things such
8 as body-worn camera footage, subject resistant
9 reports, which is a use of force report, for the
10 City of Rochester. All the things investigators
11 in our investigations division do, we still have
12 access and review those documents.

13 Q. Okay. When you were chief of investigations, did
14 you make recommendations to RPD with respect to
15 officer discipline?

16 A. When I was what?

17 Q. When you were chief of investigations.

18 A. I was never chief of investigations.

19 Q. When you worked in the investigations unit or
20 division of the Rochester Police Accountability
21 Board, did you make recommendations to RPD as far
22 as officer discipline goes?

23 A. No.

1 Q. Okay. What kind of recommendations or
2 interactions would the investigations division of
3 the Rochester Police Accountability Board have
4 with the police department?

5 A. Currently?

6 Q. Currently.

7 A. Currently, they do make recommendations. Prior,
8 back when I was affiliated with the division, we
9 did not. We were still setting up the processes
10 for how investigations would be conducted.

11 Q. Okay. So when you were in the investigations
12 division, you set up the processes but you could
13 not at that time make recommendations to RPD on
14 officer discipline?

15 A. Yes. We were doing the work of setting up the
16 investigations, but could not make
17 recommendations.

18 Q. Okay. In your current capacity, how many policy
19 recommendations would you say you've made to RPD?

20 A. We have published three. Now, there is a
21 processes for these things, only one of which has
22 been finalized, the other one will be -- one of
23 the other two will be finalized tomorrow.

1 Q. So correct me if I'm wrong. You've published
2 three policy recommendations?

3 A. Um-hum.

4 Q. Correct?

5 A. That's correct.

6 Q. Can you tell me, can you walk me through those
7 three policy recommendations?

8 A. So my division published a protest policy
9 recommendation prior to me being in the division.

10 Q. Okay.

11 A. We've published a disciplinary matrix, and we've
12 published a data transparency piece.

13 Q. Has RPD adopted or implemented any of your policy
14 recommendations?

15 A. RPD is in the process of reviewing the one that's
16 been finalized, which is the disciplinary matrix.
17 They have reviewed and have access to all three.
18 And I can't say whether they have fully utilized
19 that information, but some of their processes
20 have changed.

21 Q. Okay. Have any of your policy recommendations up
22 to this point had to do with enforcement of the
23 New York State Vehicle and Traffic Law?

1 A. No. However, our data transparency piece touches
2 on collection of demographic information when
3 stops occur. In order to prevent, you know, any
4 sort of discriminatory patterns.

5 Q. So not specifically with respect to traffic
6 enforcement, but with respect to how stops and
7 interactions with the police get recorded and
8 logged?

9 A. Yeah. The goal is to sort of prevent any sort of
10 discriminatory policing, like that which I
11 believe we saw here with the checkpoints, and --
12 yeah.

13 Q. How did you obtain your position, your current
14 position with the Rochester Police Accountability
15 Board?

16 A. The executive director asked me to fill this
17 role.

18 Q. So you were hired basically by the person
19 basically who runs the agency?

20 A. For my current role?

21 Q. Yes.

22 A. No. I was hired at the agency in May 2022 by the
23 former and first executive director of the

1 agency.

2 Q. Okay. And that's how you started at the agency
3 or that's how you got to your current role?

4 A. That's how I started.

5 Q. Okay. And your current role, you were appointed
6 or asked to fill that role by the current
7 director?

8 A. That's correct.

9 Q. Okay. How is the director appointed?

10 A. I can't answer that for you, I don't know.

11 Q. Was your agency created by the Rochester Common
12 Council or the legislative body for the City of
13 Rochester?

14 A. The City of Rochester's City Council created a
15 referendum, which the residents of the city voted
16 overwhelmingly in favor of.

17 Q. And you mentioned that you have been involved
18 with trying to set up a similar agency in
19 Buffalo?

20 A. Yes.

21 Q. Can you tell me what you personally have done to
22 try to set up a similar agency in Buffalo?

23 A. Sure. I was appointed to the Buffalo Police

1 Advisory Board in 2018, our role was similar to
2 that of my current position, was to review and
3 assess things happening with the Buffalo Police
4 Department. However, we didn't have as much
5 power as the Rochester Police Accountability
6 Board did, instead, we operated as a sort of sub
7 body for the Buffalo Common Council. We did a
8 bit of research into what oversight agencies look
9 like throughout the country, and we put forward a
10 proposal in the summer of 2020, I believe it was,
11 for an independent oversight body here, and we
12 did so because, you know, in our role, we held
13 meetings in every area of the city, every side of
14 the city, I should say, and one of the things,
15 one of the common refrains we'd hear from folks
16 is that there was a real need for accountability
17 or oversight of the Buffalo Police Department. A
18 lot of folks felt as if, you know, when they
19 submitted complaints, there wouldn't be a just
20 outcome, and the opinion they expressed to us was
21 a need for something external to BPD, in order to
22 ensure that their officers were compliant with
23 their -- with what's expected of them in their

1 role.

2 Q. And so when that recommendation was made in 2020,
3 was it rejected by the Buffalo Common Council?

4 A. It was received and filed.

5 Q. Okay. What does that mean?

6 A. I don't work for the common council. You would
7 have to ask them.

8 Q. All right. But fair to say, that the
9 recommendation has not been implemented or
10 adopted in the City of Buffalo the way it has in
11 Rochester?

12 A. Yes.

13 Q. Okay. Was it something that the common council
14 had to vote on, do you know?

15 A. To receive and file?

16 Q. To adopt the recommendation to have a separate
17 external oversight committee, the way you just
18 described.

19 A. I'm not sure I understand the fullness of your
20 question. In order for the recommendation to be
21 adopted, did they have to vote, is that your
22 question?

23 Q. Yes.

1 A. Yes and no. Because the oversight board that was
2 pitched may take a perceived power from another
3 branch or an officer in another branch, it had to
4 go through a public referendum, but we never got
5 to that point.

6 Q. Okay. Got it. So a public referendum was never
7 put to vote in the City of Buffalo?

8 A. That's correct.

9 Q. Okay. And that became clear -- I guess, let me
10 ask. When did it become clear that it would not
11 be put to a public referendum, if you recall?

12 A. I don't recall when, and I'm also not sure it
13 ever became clear.

14 Q. Okay. So you mentioned you held a position with
15 the Buffalo Police Advisory Board in 2018?

16 A. That's when I was initially appointed, yes.

17 Q. Do you hold any position, any similar position
18 currently or are you no longer in that role?

19 A. I left that role I want to say 2021.

20 Q. Okay. Was that a paid position?

21 A. No.

22 Q. When you left the role in 2021, where did you go?

23 A. It was just a volunteer position, so I just let

1 it go.

2 Q. Okay. Got it. Were you working full-time while
3 you held that position?

4 A. Yes.

5 Q. Where did you work?

6 A. The MOCHA Center, Buffalo.

7 Q. What's the MOCHA Center?

8 A. The Men of Color Health Awareness Center. It was
9 and is a drop-in space dedicated to young queer
10 and trans people of color.

11 Q. Where is it located?

12 A. Currently, Evergreen Health.

13 Q. Where was it located when you worked there?

14 A. We had an office on Main Street, across from
15 Anchor Bar.

16 Q. Okay.

17 A. I don't know the exact address.

18 Q. I know where you're talking about. And how long
19 did you work there?

20 A. From May 2017 until 2021.

21 Q. Why did you leave your employment with the MOCHA
22 Center?

23 A. The MOCHA Center Buffalo was being acquired by

1 Evergreen Health, and I opted not to continue
2 employment once that acquisition was taking
3 place.

4 Q. Any particular reason why that made you not want
5 to continue your employment?

6 A. I just wasn't comfortable with Evergreen Health.

7 Q. Okay. So where, if anywhere, did you go to work
8 after you left MOCHA?

9 A. I actually took time off. It was time to myself
10 for a while.

11 Q. And how long did that last?

12 A. Until maybe late June, early July 2021.

13 Q. And at that point you obtained different
14 employment?

15 A. Yes.

16 Q. What employment did you obtain at that point?

17 A. I became the co-campaign manager for India
18 Walton's campaign for mayor of the City of
19 Buffalo.

20 Q. What did you do as --

21 A. Slash policy director. I had two roles.

22 Q. Okay. What did you do as the co-campaign
23 director and policy director for India Walton's

1 campaign?

2 A. Helped create her platform, and ran the
3 day-to-day operations of her campaign, along with
4 my co-campaign manager.

5 Q. How did you get that job?

6 A. I was recruited by India Walton.

7 Q. Do you know India Walton personally?

8 A. Not really. We're not friends, but I knew her
9 from just organizing spaces.

10 Q. Okay. And did you stay in that role up until the
11 end of the general mayoral election?

12 A. No.

13 Q. When did you leave that role?

14 A. October.

15 Q. Why did you leave the role?

16 A. A number of reasons. Number one, the campaign
17 was going in a different direction, and another
18 reason was I just generally didn't want to
19 continue in that role.

20 Q. When you say the campaign was going in a
21 different direction, what do you mean?

22 A. We began to lean a bit more on a state affiliate
23 of the working families party, and I didn't agree

1 with it.

2 Q. Okay. Why didn't you agree with relying on or
3 leaning on a state affiliate of the working
4 families party?

5 MS. TEFFT: Objection.

6 THE WITNESS: I generally just didn't like the way
7 they operated.

8 BY MR. SAHASRABUDHE:

9 Q. What didn't you like about how they operated?

10 MS. TEFFT: Objection.

11 THE WITNESS: That's all I can say right now at this
12 time.

13 BY MR. SAHASRABUDHE:

14 Q. So where did you go after you left India Walton's
15 campaign?

16 A. Continued taking time to myself, which I should
17 have done.

18 Q. Did there come a time where you got further
19 employment before you obtained a position with
20 the Rochester Police Accountability Board?

21 A. No.

22 Q. Okay. So you currently live in the City of
23 Rochester?

1 A. Yes.

2 Q. How long have you lived there?

3 A. Since September. But I spend almost every
4 weekend and every holiday and whenever I take
5 time off in Buffalo.

6 Q. Okay. But your permanent residence is currently
7 in Rochester, New York?

8 A. That's correct.

9 Q. Before you moved to Rochester in September, where
10 did you live?

11 A. 122 O'Connell Avenue.

12 Q. How long did you live there?

13 A. We moved there summer 2022.

14 Q. And you lived there from summer 2022 up until you
15 moved in September?

16 A. Oh, I said 2022, sorry. Summer 2020, up until
17 September of 2022.

18 Q. Okay. Did you own or rent?

19 A. Rent.

20 Q. Who did you live there with?

21 A. My partner.

22 Q. Where did you live before that?

23 A. 500 Seneca Street.

1 Q. Did you own or rent?

2 A. Rent.

3 Q. How long did you live there?

4 A. Summer of 2017 until summer of 2020.

5 Q. And where did you live before that?

6 A. 87 Shirley Avenue, from I want to say April until
7 that summer.

8 Q. Okay. So fair to say we've talked about all the
9 different places you've lived over the past five
10 to seven years?

11 A. Yeah. Five to six.

12 Q. All right. I want to show you, we've already
13 marked it as Defendant's Exhibit A in previous
14 depositions. And you reviewed this in
15 preparation of your testimony here today?

16 A. This is the amended complaint?

17 Q. Yes, it is.

18 A. Then yes.

19 Q. Okay. And I'll direct you to paragraphs two
20 fifty-five through two sixty-six.

21 A. Okay. It'll take me a second to get there.

22 Q. It's a big complaint.

23 A. Okay.

1 Q. And did you specifically review paragraphs two
2 fifty-five through two sixty-six in Defendant's
3 Exhibit A --

4 A. No.

5 Q. -- to prepare for today?

6 A. No.

7 Q. Have you ever reviewed those paragraphs?

8 A. Not since I originally gave the statement.

9 Q. Okay. Do you want to take a second to look them
10 over?

11 A. Sure.

12 Q. Okay. I'll ask that you do, and let me know when
13 you think you've had sufficient opportunity to
14 review them.

15 A. I believe I've had sufficient opportunity, yeah.

16 Q. Already? Okay.

17 A. Yeah.

18 Q. Photographic reader then, that was fast. So I
19 want to direct your attention quickly to -- well,
20 we'll go with paragraph two fifty-six, it alleges
21 here that you, Mr. Hall, are a member of the
22 organizational Plaintiff in this matter, Black
23 Love Resists In The Rust. Is that still true

1 today?

2 A. I believe I'm still a dues-paying member, I have
3 to verify with the ED.

4 Q. When did you become a member?

5 A. I don't recall the exact date. It's been some
6 years.

7 Q. Was it over five years ago?

8 A. I believe so.

9 Q. When was the last time that you attended a
10 meeting held by Black Love Resists In The Rust?

11 A. Last year. So 2022.

12 Q. Do you regularly attend their meetings?

13 A. Not since I moved.

14 Q. And you said you're a dues-paying member?

15 A. Yes. I believe so.

16 Q. Okay. When was the last time you paid dues?

17 A. They're on automatic, so I don't know if they're
18 still coming out of my account or not.

19 Q. Okay. Do you know -- withdrawn. Do you know, do
20 you pay your dues monthly or did you pay your
21 dues monthly?

22 A. I believe they were monthly. Again I'd have to
23 verify with the ED.

1 Q. And do you know how much your dues were?

2 A. Between five to ten dollars, I'm not sure what
3 the amount was. That's an estimate, not sure.

4 Q. So you haven't been to a meeting in a year
5 though?

6 A. That's correct.

7 Q. Before you moved to Rochester, did you regularly
8 attend meetings?

9 A. Yes.

10 Q. How often were the meetings held?

11 A. So I was also a board member, so we met a bit
12 more frequently than the regular general body
13 meetings. But I would say twice a month.

14 Q. How long were you a board member?

15 A. One year.

16 Q. What year?

17 A. 2021 to 2022.

18 Q. Okay. So before the original complaint in this
19 action was filed?

20 A. That's correct.

21 Q. Okay. Why did you -- so did you stop being a
22 board member because you moved to Rochester?

23 A. No. No. Capacity, just capacity issues.

1 Q. Just didn't have enough time?

2 A. Yeah.

3 Q. Okay. Do you recall, how did you become a board
4 member?

5 A. The executive director reached out and asked me
6 to join the board.

7 Q. There was no vote or anything like that from
8 members of the organization?

9 A. I don't know if there was. I don't recall.

10 Q. Okay. Do you recall becoming involved with this
11 lawsuit through your involvement with Black Love
12 Resists In The Rust?

13 A. No.

14 Q. So it was separate and apart from you being a
15 member that you became aware of this lawsuit?

16 A. Yes.

17 Q. Okay. Let's go to paragraph two sixty. And
18 before we get into the specifics, so you've read
19 paragraphs two fifty-five through two sixty-six,
20 correct?

21 A. I have. And I just want to point out, I believe
22 I said at some point that I lived at 87 Shirley
23 from April 2017, but I may have moved back a

1 little early. I'd have to look at when I left my
2 job with the New York State Senate, that would
3 tell me what the exact date I moved back to 87
4 Shirley.

5 Q. That's okay. If there's -- if you're off by a
6 month, that's fine.

7 A. Yeah.

8 Q. But so you've read the entirety of paragraphs two
9 fifty-five through two sixty-six?

10 A. Um-hum.

11 Q. Okay. Fair to say, that generally those
12 paragraphs allege that you went through one
13 vehicle and traffic safety checkpoint during the
14 time that you were a resident of the City of
15 Buffalo, correct?

16 A. Yes.

17 Q. Does that remain true today?

18 A. Yes.

19 Q. Okay. And I want to go to paragraph two sixty.
20 Is it fair to say that the officer you interacted
21 with at the one vehicle and traffic safety
22 checkpoint that you encountered asked to see your
23 driver's license and checked your inspection

1 sticker?

2 A. Yes.

3 Q. And after that happened, you weren't asked to
4 pull over to the side of the road, correct?

5 A. Yes.

6 Q. In that you -- so that you were not asked to pull
7 over to the side of the road?

8 A. That is correct.

9 Q. Okay. And you ultimately drove through the
10 checkpoint, correct?

11 A. Yes.

12 Q. Didn't receive a ticket?

13 A. That's correct.

14 Q. Okay. Weren't arrested, put in custody, detained
15 in any way, correct?

16 A. That's correct.

17 Q. Okay. And that remains the only checkpoint
18 you've ever gone through?

19 A. In the City of Buffalo?

20 Q. Yes.

21 A. Yes.

22 Q. Mr. Hall, when, if any -- when, if at all, did
23 you last receive a traffic ticket in the City of

1 Buffalo?

2 A. From the Buffalo Police Department?

3 Q. Yes. Or at all.

4 A. Oh, at all.

5 Q. In the City of Buffalo.

6 A. Yeah. This was Easter, forgive me, I don't know
7 the year. It may have been 2020, 2019, one of
8 those two, on the 198.

9 Q. Okay. Was it a speeding ticket?

10 A. Yes.

11 Q. Was it a Buffalo Police Department officer who
12 pulled you over?

13 A. No.

14 Q. Was it a New York State trooper?

15 A. Yes.

16 Q. Okay. How about, have you ever received a
17 traffic ticket from any member of the Buffalo
18 Police Department in the last five years?

19 A. No.

20 Q. Okay.

21 A. A parking ticket, yes. But no.

22 Q. Okay. How many times have you received a parking
23 ticket?

1 A. I don't know the exact number, but more than
2 once.

3 Q. Okay. You can't recall the specific dates or
4 instances that those happened?

5 A. I recall one specific incident, not the date,
6 where I got a parking ticket while still inside
7 the vehicle. I was parked not far from here, the
8 Pearl Street Brewery, with my hazard lights on
9 responding to a text because I didn't want to
10 text and drive. And as I'm texting I notice one
11 of the City of Buffalo parking folks pull up
12 directly on the other side of the street, they
13 sort of sat for a minute, and, you know, I'm
14 curious, so I'm looking over while still texting,
15 and then they pulled off, and in the back of my
16 mind I'm like I think I just got a parking
17 ticket, and sure enough, in the mail was a
18 parking ticket.

19 Q. I see. Issued by the City of Buffalo?

20 A. That's correct.

21 Q. Was the car you just described, was it a police
22 car?

23 A. No.

1 Q. Okay. It was one of the -- I know what you're
2 talking about. I don't know the name. The
3 parking -- or, the agency for the City of Buffalo
4 that has cars that patrol parking lots --

5 A. That's the one.

6 Q. -- around downtown?

7 A. Yes.

8 Q. Okay. You only received one parking ticket
9 though in that instance?

10 A. In that instance, yes.

11 Q. Okay. And did you pay the parking ticket?

12 A. Well, I fought it, lost, and then had to pay it.

13 Q. You fought it in traffic court?

14 A. Yeah. In city hall?

15 Q. Yes.

16 A. Yes.

17 Q. Okay. And ultimately you were found responsible?

18 A. That's what they concluded.

19 Q. Okay. And you did ultimately pay it?

20 A. I did.

21 Q. Okay. You mentioned you worked in the state
22 senate?

23 A. Yes.

1 Q. Was that before you worked for MOCHA?

2 A. Yes.

3 Q. Okay. How long did you work there for?

4 A. From August or September 2016 until March 2017.

5 Q. So you went there after law school?

6 A. That's correct.

7 Q. Okay. What did you do for the state senate?

8 A. I was a New York State senate fellow, in the
9 office of Senator Jose Peralta.

10 Q. Did you live in Albany during that time?

11 A. Yes. But I kept coming back and forth.

12 Q. What did you do as a fellow for Jose Peralta's
13 office?

14 A. Basically a clerk, clerk work.

15 Q. And then it was after that you went to MOCHA?

16 A. That's correct.

17 Q. All right. And that's your -- we've now talked
18 about the entirety of your employment since you
19 left law school?

20 A. That's correct.

21 MR. SAHASRABUDHE: All right. That's all I have.

22 THE WITNESS: That's it for the day?

23 MR. SAHASRABUDHE: That's it.

1 THE WITNESS: Wow.

2

3 EXAMINATION BY MS. TEFFT:

4

5 Q. Well, I just have a few more questions. So
6 first, Mr. Hall, you mentioned that though you
7 live in Rochester, you do come to the City of
8 Buffalo frequently, yes?

9 A. All the time.

10 Q. And you drive here when you come?

11 A. All the time.

12 Q. Where in the City of Buffalo do you drive?

13 A. All over the place. I love to eat, so I always
14 try to experience new restaurants, you'll find me
15 on every part of the city, west, north, east,
16 south, I'm there.

17 Q. Is there an area that you frequent the most?

18 A. Currently it will be my partner's apartment,
19 which ironically is the same one I lived at at
20 500 Seneca Street. You can also find me on the
21 West Side at my brother's house. Yeah, that's
22 about it.

23 Q. Okay. And pivoting to a different subject. You

1 were discussing your efforts to establish a
2 police advisory board here in Buffalo --

3 A. Um-hum.

4 Q. -- earlier, you mentioned that folks in Buffalo
5 had been describing the desire for more just
6 outcomes as a result of their complaints to the
7 Buffalo Police Department, is that correct?

8 A. Yes.

9 Q. Can you elaborate on some of the issues that
10 Buffalo citizens were coming to you about
11 concerning bringing complaints and complaint
12 outcomes?

13 A. Yes. So when we first began in 2018, one of the
14 biggest complaints was actually of the strike
15 force, and the usage of checkpoints. A lot of
16 folks on the East and West Side of the city,
17 because we did, again, we did listing sessions in
18 all parts of the city, but those two portions
19 particularly felt like they were being targeted
20 for checkpoints.

21 And then some folks would add on to that how
22 they would be ticketed for multiple infractions
23 in a single stop. I particularly can recall one

1 individual who would ride around with all of
2 their windows down, because his windows were
3 tinted, and they recalled a story where they were
4 stopped once and ticketed for each individual
5 window, which just blows my mind, it just doesn't
6 make sense, why anyone would do that, unless
7 you're trying to like raise revenue for the city
8 or something, and it was discussions of incidents
9 like that, where folks were like we need somebody
10 to oversee the police department. They thought
11 it would be the police advisory board when the
12 common council created it, and so the first year
13 we really had to re-educate folks that our job
14 was not to do the independent sort of monitoring
15 or investigation work that you would see in
16 civilian oversight boards in other cities, our
17 job was merely to listen and make policy
18 recommendations after reviewing and assessing
19 BPD's current practices at the time. But as time
20 went on, those calls for independent oversight,
21 they just kept going, so we decided to put some
22 time in and research what best practices looked
23 like nationally, came up with a model, but the

1 city did not unfortunately create one.

2 Q. And did folks also raise concerns to you just
3 about how their complaints made to the BPD were
4 handled?

5 MR. SAHASRABUDHE: Form.

6 THE WITNESS: Yeah. Yeah. Some folks actually tried
7 to give us formal complaints. I mean, it's one
8 thing to hear verbal complaints, but folks wanted
9 to submit things in writing for us to
10 investigate, but that was well outside of our
11 role. They felt, and I think the Investigative
12 Post did an article on this topic, that when
13 complaints were given to BPD, nine times out of
14 ten, and again, I think that's what the
15 Investigative Post said, they would be found not
16 sustained or the officer would be exonerated in a
17 sense, so there just wasn't faith in that system.
18 And that's why we created that proposal.

19 MS. TEFFT: Okay. I don't have anything further.

20

21 RE-EXAMINATION BY MR. SAHASRABUDHE:

22

23 Q. Really quickly. Staying on the record because I

1 forgot to ask about this.

2 A. Sure.

3 Q. She marked it so I might as well do this. So I
4 just showed you what I've marked as Defendant's
5 Exhibit T. So this is something that was
6 produced by your counsel, and I understand this
7 is a document or photograph or image that you
8 gave to them. Would that be correct?

9 A. Yes.

10 Q. Okay. Is this a text message?

11 A. No.

12 Q. Is it an e-mail?

13 A. No.

14 Q. What is it?

15 A. This is a note, you know, the notes app in the
16 iPhone.

17 Q. I see.

18 A. That I made at a meeting held July 10th, 2019, at
19 271 Grant Street, where the D district Chief
20 Barbara was responding to the community. There
21 was a shooting on Greenwood, and he wanted to
22 like sort of address community needs. During
23 that discussion, Chief Barbara said that they

1 just had to get rid of -- I'm paraphrasing what's
2 here, but also recalling what was said. They
3 just had to get rid of the unit because they were
4 profiling, racially profiling, and there was a
5 subsequent question from the audience asking
6 which unit, and Chief Barbara specified the
7 strike force, at the time, which had just been
8 disbanded.

9 Q. So this is a note you took to record or
10 transcribe a statement that D district Chief
11 Barbara gave in July of 2019?

12 A. That's correct.

13 Q. Okay. Did Chief Barbara say anything more
14 specific than what you just described?

15 A. It was a lengthy discussion, a lot of things
16 stood out. So this is a thing that I took note
17 of, particularly because I recalled this exact
18 case, but he also went on to point out things
19 like how they would knock on the doors of
20 individuals they suspected of gang activity, and
21 the basis for that would be social media posts,
22 which I thought was asinine. But this is what
23 really stood out, that's relevant here today.

1 Q. Okay. So did he -- at this meeting, did you talk
2 specifically about checkpoints?

3 A. No. Again, I didn't host the meeting. I was
4 just there attending, Chief Barbara sort of went
5 on his own unprompted.

6 Q. So checkpoints were not discussed at the meeting?

7 A. No.

8 Q. And you have no knowledge one way or the other
9 whether Chief Barbara was ever a part of strike
10 force or involved with strike force?

11 A. I do not.

12 MR. SAHASRABUDHE: Nothing further.

13 MS. TEFFT: Nothing further from me either.

14 THE WITNESS: Okay.

15

16 * * * * *

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23

1 I HEREBY CERTIFY that I have read the
2 foregoing 43 pages and that, except as to those
3 changes set forth in the attached errata form(s),
4 they are a true and accurate transcript of the
5 testimony given by me in the above-entitled
6 action on May 17, 2023.

7
8
9
10 -----
11 De 'JON HALL
12
13

14 Sworn to before me this

15
16 ----- day of ----- 2023.
17
18

19 -----
20 Notary Public.
21
22
23


1 STATE OF NEW YORK)

2 SS:

3 COUNTY OF ERIE)

4
5 I, Nichole Winans, a Notary Public in and
6 for the State of New York, County of Erie, DO
7 HEREBY CERTIFY that the testimony of De'JON HALL
8 was taken down by me in a verbatim manner by
9 means of Machine Shorthand, on May 17, 2023.
10 That the testimony was then reduced into writing
11 under my direction. That the testimony was taken
12 to be used in the above-entitled action. That
13 the said deponent, before examination, was duly
14 sworn by me to testify to the truth, the whole
15 truth and nothing but the truth, relative to said
16 action.

17 I further CERTIFY that the above-described
18 transcript constitutes a true and accurate and
19 complete transcript of the testimony.

20
21 
22 _____
23 NICHOLE WINANS,
Notary Public.

ERRATA FORM

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